

# **EXHIBIT A**



CIVIL COMPLAINT

Mag. Dist. No: 38-1-12  
MDJ Name: EDWARD C. KROPP SR.  
Address: One Security Plaza, Suite 102  
Pottstown, PA 19464  
Telephone: (610) 326-9274

PLAINTIFF: NAME and ADDRESS  
CHARLENE DePROPHETIS  
8 Green Briar Court  
Sanatoga, PA 19464

DEFENDANT: V. NAME and ADDRESS  
TOWER HEALTH  
Post Office Box 16052  
Reading, PA 19612

Docket No: CV-51-2020  
Case Filed: 3/9/2020

	AMOUNT	DATE PAID
FILING COSTS	\$ 177.25	
POSTAGE	\$ 16.25	
SERVICE COSTS	\$	
CONSTABLE ED.	\$	
TOTAL	\$ 177.25	

Pa.R.C.P.M.D.J. No. 206 sets forth those costs recoverable by the prevailing party.

To The Defendant: The above named plaintiff(s) asks judgment against you for \$ 12,000.00 together with costs upon the following claim (Civil fines must include citation of the statute or ordinance violated):

At all times relevant hereto, plaintiff had a life insurance policy through defendant and paid premiums directly to defendant (taken from plaintiff's bi-weekly employment check). Plaintiff's husband passed in October 2019 and, shortly thereafter, plaintiff made a request to be paid life insurance benefits in the amount of \$20,000. Defendant's representatives indicated that, due to the decedent's age, there is a "age devaluation or age deduction" and that plaintiff's payment would only be \$6,000. Plaintiff was never informed by defendant's representatives of the reduction and there is no reference to a decreased amount in the publications that were presented \*\*SEE CONTINUATION SHEET

I, Adam Sager, Esquire for Plaintiff verify that the facts set forth in this complaint are true and correct to the best of my knowledge, information, and belief. This statement is made subject to the penalties of Section 4904 of the Crimes Code (18 PA. C.S. § 4904) related to unsworn falsification to authorities.

I certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently than non-confidential information and documents.

(Signature of Plaintiff or Authorized Agent)

The plaintiff's attorney shall file an entry of appearance with the magisterial district court pursuant to Pa.R.C.P.M.D.J. 207.1

If you intend to enter a defense to this complaint, you should notify this office immediately at the above telephone number. You must appear at the hearing and present your defense. Unless you do, judgment may be entered against you by default.

If you have a claim against the plaintiff which is within the magisterial district judge jurisdiction and which you intend to assert at the hearing, you must file it on a complaint form at this office at least five days before the date set for the hearing.

If you are disabled and require a reasonable accommodation to gain access to the Magisterial District Court and its services, please contact the Magisterial District Court at the above address or telephone number. We are unable to provide transportation.



**\*\*CONTINUATION OF CIVIL COMPLAINT**

**Charlene DeProphetis**

8 Green Briar Court

Sanatoga, PA 19464

v.

**Tower Health**

Post Office Box 16052

Reading, PA 19612-6052

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to plaintiff in 2019. Plaintiff demands judgment in the amount of \$12,000, together with interest and legal fees as a result of defendant's breach of the contractual obligations due to plaintiff, as well as defendant's intentional and vexatious actions in denying plaintiff the proper and appropriate coverage that was agreed upon.

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## **Notice to Defendant**

- If you plan to enter a defense to the attached complaint, **you must notify the court immediately in writing.**
  - Your notice must be received at **least 5 (five) days prior to your scheduled hearing date.**
  - If you enter an “intent to defend” the court will reschedule your hearing for a NEW DATE and notify the plaintiff.
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- If you settle this case before your scheduled hearing, the plaintiff must notify our court in writing. **ANY and ALL payments are to be made directly to the plaintiff.**
  - If a judgment is entered against you, you have 30 days to make payment or to file an appeal. Appeals are filed at the Prothonotary’s Office, Court of Common Pleas, County of Montgomery Courthouse, 2 E. Airy St. Norristown, Pennsylvania 19401. **Questions regarding an appeal should be directed to the Prothonotary’s Office at (610)278-3360.**

District Court 38-1-12  
One Security Plaza, Suite 102  
Pottstown, PA 19464  
Judge Edward C Kropp Sr.